

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 4:19 CR 22 RLW JMB

W.T. CORTEZ LAKES,

Defendant.

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with threatening a federal law enforcement officer in violation of Title 18, United States Code, Section 115; threatening a court officer in violation of Title 18, United States Code, Section 1503; and being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g).
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against the defendant, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release warrant the defendant's detention pending trial.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/Jason S. Dunkel
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